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 Counsel for the United States

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,)	2:15-CR-122-RFB
)	
Plaintiff,)	United States of America's Unopposed Motion
)	to Extend Time to Respond to Ridgewood
v.)	Savings Bank's Petition for Ancillary Hearing
)	Under 21 U.S.C. § 853 (ECF No. 30) and
TONY CHAU,)	Order
)	(Third Request)
Defendant.)	

The United States of America respectfully moves this Court for an Order extending the time for the United States to respond to the Petition for Adjudication of Interest Under 21 U.S.C. § 853 (ECF No. 30) filed by Ridgewood Savings Bank (RSB). This motion is the third request for an extension of time to respond to RSB's petition for Ancillary Hearing (ECF No. 30) because negotiations between RSB, the government, and Turtle Bay Towers Corp. (TBTC), are moving forward towards resolution. The original date to respond was April 10, 2016. The deadline for responding to the Verified Petition is June 10, 2016. The United States requests an extension of time to and including August 10, 2016.

The grounds for extending the time are as follows.

V.R. Bohman, counsel for RSB, was contacted on June 1, 2016, and agreed to the extension of time.

1 The AUSA assigned to file the response to the Petition for this case is engaged in
2 settlement negotiations with Attorney Bohman. He is also attempting to complete the details
3 regarding the liquidation the property with all parties, including TBTC and RSB. The negotiations
4 have not completed on time but are still being actively pursued, and details of the liquidation are in
5 progress.

6 This Motion is not submitted solely for the purpose of delay or for any other improper
7 purpose.

8 This Court should grant an extension of time to, and including, August 10, 2016, for the
9 United States to respond to the RSB's Petition (ECF No. 30).

10 DATED: June 3, 2016.

11 DANIEL G. BOGDEN
12 United States Attorney

13
14 /s/ Daniel D. Hollingsworth
15 DANIEL D. HOLLINGSWORTH
16 Assistant United States Attorney

17
18 IT IS SO ORDERED:

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20 
21 RICHARD F. BOULWARE, II
22 UNITED STATES DISTRICT JUDGE

23
24 DATED: June 16, 2016

PROOF OF SERVICE

A copy of the foregoing was served upon counsel of record via Electronic Filing on June 3, 2016.

/s/ Daniel D. Hollingsworth
DANIEL D. HOLLINGSWORTH
Assistant United States Attorney